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June 3, 2004
Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
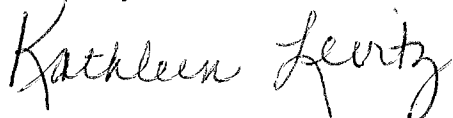445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Ms. Dortch:

This is to inform you that on June 2, 2004, I, representing BellSouth Corporation, met with Cheryl Callahan and Pam Slipakoff of the Wireline Competition Bureau and Jennifer Salhus and Jeffrey Steinberg of the Wireless Telecommunications Bureau. Bill Shaughnessy and Ron Steen, both representing BellSouth Corporation, participated in the meeting by telephone. The purpose of the meeting was to present BellSouth's views on the NANC Report & Recommendation on Intermodal Porting Intervals, filed with the Commission on May 3, 2004. The attached document formed the basis of the presentation.

In accordance with Section 1.1206, I am filing this notice and attachment electronically and request that you please place both in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Cheryl Callahan
        Pam Slipakoff

NANC Report & Recommendation on Wireless Local Number Portability (WLNP) Intermodal Porting Intervals

1) **Purpose:**
   a) Provide BellSouth's view on WLNP intermodal porting intervals

2) **Background:**
   a) On October 14, 2003, met with FCC to explain the steps involved in a simple wireline-wireline port:

   i) During the discussion, we reminded the staff that the wireline porting processes were developed by the industry, approved by the NANC and subsequently codified by the FCC.

   ii) The FCC should not change wireline-porting intervals without a demonstrated need.
   (1) No evidence exists that existing intervals will hinder inter-modal porting.

   b) At the NARUC winter meeting in D.C., NeuStar noted that since WLNP began on Nov. 24, 2003:
   i) 95% of ports have been from one wireless carrier to another and "most of these ports have been accomplished in a day."

   ii) 5% were intermodal ports between wireline and wireless carriers and those have "have taken up to several weeks to accomplish."

   c) On 3/2/04 and 6/2/04 BellSouth provided analysis on intermodal porting problems experienced by BellSouth since the beginning of WLNP on 11/24/03.

3) **NANC's Intermodal Porting Interval IMG's Final Report**
   a) Only simple ports were defined and discussed in the report.

   b) The recommendation for simple inter-modal ports is:
   - Old Network Service Provider (ONSP) returns FOC for error free electronic LSR within 5 hours.
   - ONSP sets 10D trigger and sends confirming Subscription Version at least 24 hours prior to 12:01 AM on the due-date.
   - No earlier than 24 hours before the due-date, New Network Service Provider (NNSP) can modify due date at NPAC and activate the port.

4) **BellSouth Position**

   a) No evidence exists that the existing wireline interval is hindering inter-modal porting.

   b) Industry focus should be on ensuring that WSPs can meet the existing wireline intervals for intermodal porting and adhere to existing industry processes.

c) However, if the interval is to be shortened, then BellSouth supports the recommendation (A2/C3) in the NANC Report & Recommendation on Intermodal Porting as the most efficient and most economical of the alternatives considered by the IMG.

d) Finally, service providers should be allowed to recover the costs incurred to shorten porting intervals.

BellSouth Updated Analysis of WLNP Intermodal Issues

1) **Purpose:**
   a) Provide updated analysis on intermodal porting (wireline to wireless & wireless to wireline) problems experienced by BellSouth

2) **Background:**
   a) On 3/2/04, BellSouth provided analysis on intermodal porting problems experienced by BellSouth since the beginning of WLNP on 11/24/03:
      (1) BellSouth established an interim process to address "backlog" of "half-ported" TNs.
      (2) BellSouth increased communication with WSPs:
         (a) Created WSP 'Who To Call' reference matrix based on scenarios
         (b) Selectively sent letters to high-level management of WSPs requesting their assistance to adhere to nationally established wireline to wireless porting processes.
      (3) BellSouth's 'root cause' analysis indicated that most WLNP porting problems involve WSPs using the same service bureau.

3) **BellSouth's Follow Up Analysis on Porting Errors:**
   a) Received responses to letter from 4 WSPs. In addition, 7 WSPs have worked with BST using the interim process to address and clear backlogs. These backlog issues were cleared by 4/30/04.

   b) "Half-ported" TNs cleared through 3/9/04:

Wireless Service Provider	Number of Ports Cleared
WSP #1	237
WSP #2	225
WSP #3	103
WSP #4	48
WSP #5	60
WSP #6	3
Total	**676**

   c) Analysis of Ports in Error Between 3/9/04-5/5/04

Wireless Service Provider	Total Ports	Ports in Error	% Of Total Ports
WSP #1	699	34	5
WSP #5	282	41	15
WSP #2	494	57	12
WSP #3	310	70	23
WSP #7	95	1	1
WSP #8	275	16	6
WSP #4	271	15	6
WSP #6	46	2	34
Grand Total	**2472**	**236**	**10**

d) On 5/5/04, Bellsouth sent follow-up letters to WSPs with "half-ports" that still were not cleared. The letters gave these WSPs until May 14th to tell BellSouth how they would address the remaining backlog and set May 28th as the final date to address the remaining backlog of 150 numbers using the BellSouth interim backlog process.

e) The same letters explained that any additional improper ports must be handled using the industry-approved process for porting in error which requires the new service provider to:
   - Concur to a port back Subscription Version (SV) of the number to the Old Service Provider (BellSouth) via NPAC. (Without the WSP's concurrence to the SV, BellSouth will port the number back without concurrence after the timers expire.)
   - To submit an error free Local Service Request (LSR) to the Old Service Provider (BellSouth) requesting a port to the WSP network.
   - To follow the approved procedures to port the number back to their network upon receipt of a Firm Order Confirmation (FOC) Accept.

4) **BellSouth's Follow Up Analysis on Customer Appeals (as of 5/5/04):**
   a) BellSouth has received 182 WLNP customer appeals:
      (1) Executive: 34
      (2) FCC: 73
      (3) PSC: 50
      (4) Misc: 25

      *Currently 149 (82%) WLNP customer appeals have been cleared.

   b) Our investigation indicates that:
      (1) 92 appeals involved situations where no LSR was received.
      (2) 15 appeals involved a customer with disconnected service.
      (3) 25 appeals involved situations where the WSP has not responded to clarification, rejection, or the TN was not ported by the WSP.
      (4) 5 appeals involved porting from a wireless service provider to another wireless service provider.
      (5) 13 appeals involved 'other' situations.

   c) Appeals by month:
      (1) 17 appeals received in 12/03
      (2) 59 appeals received in 01/04
      (3) 47 appeals received in 02/04
      (4) 44 appeals received in 03/04
      (5) 25 appeals received in 04/04

5) **Summary:**
   a) BellSouth has acted promptly to address WLNP porting issues; as a result, BellSouth working with the WSPs has largely eliminated the backlog of 676

"half-ports." BellSouth will, however, port back any numbers not addressed by 5/28/04. The Service Bureau acting on behalf of WSPs remains cooperative and proactive in addressing porting issues.

b) Working closely with BellSouth, most WSPs are making progress on root-cause analysis of problem ports.

c) The availability of wireless number portability in non-top 100 MSA markets beginning May 24 may result in new issues. BellSouth will continue to monitor WLNP porting data to determine if the number of "ports in error" increases and will be prepared to respond promptly if this occurs.

BellSouth Analysis of WLNP Intermodal Issues

1) **Purpose:**
   a) Provide analysis on intermodal porting problems experienced by BellSouth

2) **Background:**
   a) On 10/10/2003, BellSouth filed written ex parte:
      (1) Summarizing BellSouth's Communication Plan for WLNP implementation;
      (2) Providing a status of inter-company testing between BellSouth and Wireless Service Providers (WSPs);
      (3) Providing a status of coordination effort between BellSouth and Specific WSPs to facilitate WLNP;
      (4) Key points:
         (a) In September 2003, BellSouth offered instructor led training classes to help WSPs implement WLNP processes including how to complete LSRs. (Training has been available since September. No charge for training September through January.)
         (b) BellSouth is adhering to wireline porting processes, flows and intervals as originally adopted by NANC and codified by FCC in Section 52.26 (a) of its rules.

   b) On 10/14/2003, BellSouth did an ex parte explaining wireline porting process and intervals.
      (1) Key points:
         (a) LSR and FOC exchange must be finalized prior to the New Service Provider sending the new Service Provider Subscription Version Create message and the subsequent activation of port in NPAC;
         (b) Receipt of activate message that is associated with a valid LSR drives disconnect process in BellSouth

   c) On 1/20/04 BellSouth filed comments on the FNPRM (Docket 95-116) dealing with WLNP issues:
      (1) BellSouth specifically noted two types of intermodal porting problems:
         (a) Ports from BellSouth to WSPs are activated prior to the WSP receiving a FOC "accept."
         (b) FOCs on port-ins to BellSouth sent to incorrect locations.

3) **Quantify the Intermodal Porting Problems:**
   a) Customer Appeals:
      (1) BellSouth has received 109 WLNP customer appeals:
         (a) Executive: 28
         (b) FCC: 44
         (c) PSC: 26
         (d) Misc: 11

      (2) Ninety-three appeals involved WSPs using the same service bureau for LSR/FOC processing.

      (3) Our investigation indicates that:
         (a) 38 appeals involved situations where no LSR was received.
         (b) 13 appeals involved delays in receiving the LSR.
         (c) 27 appeals involved situations where the WSP has not responded to clarification, rejection, or the TN was not ported by the WSP
         (d) 6 appeals involved porting from a wireless service provider to another wireless service provider.
         (e) 25 appeals involved 'other' situations.

      (4) Appeals by month:
         (a) 14 appeals received in 12/03
         (b) 47 appeals received in 01/04

(c) 48 appeals received in 02/04

b) Intermodal Port Problems:
   (1) Wireline to Wireless Ports:
      (a) As of 2/6/04, 628 TNs have been ported from BellSouth and activated in the NPAC without BellSouth receiving a valid LSR and/or returning the FOC "accept".

         (i) December 03:   257
         (ii) January 04:   342
         (iii) Feb (through 2/5/04):   29

      (b) 91% of these ports without a LSR and/or valid FOC involve WSPs that use the same service.

      (c) Results in customer being in "half-port" status:
         (i) Call origination can occur from either landline or wireless set.
         (ii) Terminating calls are split between landline (intra-switch) and wireless (inter-switch) sets.
         (iii) Mixed service E911 condition exists.
         (iv) Dual billing – customer billed for both landline and wireless service.

   (2) Wireless to Wireline Ports:
      (a) Successfully ported 28 customers from WSPs to BST.
      (b) We have currently 88 pending orders in End User Migration Center.
      (c) Established interim steps to address dual fax number issue.

   (3) In Jan 2004, 91% (1390 out of 1520) of total calls to LCSC involved WLNP ports:
      (a) Misdirected Calls: 306
      (b) LSR/PON/CSR info: 259
      (c) LNP Info: 296
      (d) Clarification: 155
      (e) FOC: 27
      (f) Administrative: 26

c) Total Ports from BST to WSPs:
   (1) Through 2/18/04, approximately 1458 wireline to wireless ports with valid LSRs.

4) BellSouth Action:
a) Continue "day-to-day" dialogue with WSPs.

b) Create WSP *'Who To Call'* reference matrix based on scenarios. For example, scenarios include:
   (1) *Who should I contact if I have questions about a reject / clarification message I received after I submitted a LSR to BellSouth?*
   (2) *How do I get access to BellSouth Customer Service Records for my pre-order look-up?*
   (3) *I sent BellSouth a LSR on this TN last week but BellSouth never responded. Who can I talk to about this?*

c) Increase Communication:
   (1) Based on "root cause" analysis:
      (a) Selectively sent letters to WSPs on 02/23/04:
         (i) Asked high level management of WSPs requesting their assistance to:
            1. Adhere to nationally established wireline to wireless porting processes;
            2. Submit a Local Service Request to BellSouth's Local Carrier Service Center;

3. Not issue a Subscription Version message to the Number Portability Administration Center until BellSouth provides a Firm Order Confirmation "accept" with a due date;

(b) Requested an action plan in the letter to close process gaps by March 5, 2004.

(c) Also provided contact names and numbers in the letter for WSPs to call to request additional training needs, and / or seek help with non-training and technical questions.

5) **Next Steps:**
   a) Address Backlog of "half-port" TNs:
      (1) BellSouth has established an interim process to address "backlog" of TNs that have been "half-ported":
         (a) Process is manual.
         (b) Process involves working with the WSP on a one-to-one coordinated basis.
         (c) Process results in minimal disruption to customer.
         (d) BellSouth has successfully tested the process with one WSP.
         (e) BellSouth will be working with additional WSPs.

   b) Prevent future customer appeals:
      (1) Does existing process need to be changed?
         (a) EX. PIM 22

   c) Work with Industry:
      (1) Industry Forums and USTA

6) **Summary:**
   a) BellSouth's 'root cause' analysis indicates that most WLNP porting problems involve:
      (1) WSPs using the same service bureau. Third party vendors not communicating BellSouth messages back to WSP
      (2) Ports from BellSouth to WSPs activated prior to the WSP, or their authorized service bureau, receiving a Firm Order Confirmation.

   b) WSPs appear to be making varying degrees of progress on root-cause analysis of problem ports. Some have fully addressed, but others are just getting started.

   c) BellSouth is proactive in addressing WLNP porting issues. However, to prevent or eliminate future problems, WSPs must ensure that the service bureau acting on their behalf follow industry processes and flows.